UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

ARNEL FRANZUELA, an individual, Plaintiff, vs. TRANDES CORPORATION, a corporation; MICHAEL MCKINNEY, an individual; and DOES 1 - 45, inclusive, Defendants.	Case No. 08cv395 WQH (CAB) **JOINT MOTION FOR DISMISSAL, AND (PROPOSED) ORDER**

COME NOW THE PARTIES, Plaintiff ARNEL FRANZUELA, by and through his counsel, Dennis M. Grady of Grady & Associates, and Defendants TRANDES CORPORATION and MICHAEL MCKINNEY, by and through their counsel, Phillip L. Kossy and Nykia J. Wilson of Luce, Forward, Hamilton and Scripps, and hereby jointly move the Court to dismiss this action with prejudice. Plaintiff's complaint is now moot. The parties have resolved the matters alleged in Plaintiff's complaint, and the parties agree that the above-captioned case should be dismissed in its entirety with prejudice. The parties have further agreed that each party should bear his or its own attorneys' fees and costs of suit, and that the Court will maintain jurisdiction to enforce the terms of the settlement agreement between the parties.

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Based upon the foregoing, it is respectfully requested that the Court enter an order dismissing the action with prejudice, and maintain jurisdiction to enforce the terms of the settlement agreement.

GRADY AND ASSOCIATES

DATED: June 10, 2008

s/ Dennis M. Grady, Esq.

By: [signature]
Dennis M. Grady, Esq.
Attorney for PLAINTIFF,
ARNEL FRANZUELA

LUCE, FORWARD, HAMILTON and SCRIPPS LLP

DATED: July 7, 2008

s/Phillip L. Kossy, Esq.
Nykia J. Wilson , Esq.

By: [signature]
Phillip L. Kossy, Esq.
Nykia J. Wilson , Esq.
Attorneys for DEFENDANTS,
TRANDES CORPORATION and
MICHAEL MCKINNEY,

ORDER

IT IS HEREBY ORDERED that pursuant to the joint motion of the parties, the above-captioned action be dismissed with prejudice, in which the court retains jurisdiction to enforce the terms of the settlement agreement.

DATED: ____________, 2008

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William Q. Hayes

United States District Judge